

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re

Chapter 9

CITY OF DETROIT, MICHIGAN

Case No. 13-53846

Debtor

Hon. Steven W. Rhodes

**OBJECTION BY ROBERT COLE TO THE FOURTH AMENDED PLAN FOR THE
ADJUSTMENT OF DEBTS FOR THE CITY OF DETROIT**

ROBERT COLE objects to the Fourth Amended Plan for the Adjustment of Debts of the City of Detroit which was not served upon him until May 15, 2014.

PRELIMINARY STATEMENT

Robert Cole, an employee of the Michigan Humane Society, was requested by the City of Detroit Police Department to assist in removing dogs from a residential property believed to be the site of a stolen car operation. During the course of Mr. Cole's cooperative assistance, Detroit Police Officers began unlawfully shooting at the dogs. Mr. Cole was struck by two of the bullets, suffering significant physical, financial and emotional injury. Mr. Cole is entitled to substantial reimbursement and compensation for his loss arising from the violations of the United States and Michigan Constitutions as well as Michigan common law.

OBJECTIONS

Based on the foregoing, Mr. Cole's objections are as follows:

1. The constitutional claims of Mr. Cole cannot be discharged in bankruptcy proceedings.

2. Any claims against the individual employees of the City of Detroit are not dischargeable in this bankruptcy nor any bankruptcy based on the conduct of the individual officers.
3. The percentage allocated to resolution of Mr. Cole's claims in the Fourth Amended Plan is inadequate and unfair in light of the amount being paid to other creditors.
4. Funds being paid by outside organizations and/or the State of Michigan to protect the art collection at the DIA from the claims of creditors is unfairly being allocated to some creditors but not all other creditors. The collection of art at the DIA is no less vulnerable to satisfying the claims of Mr. Cole than it is for any other creditor whether that be bond holder, retiree or pensioner.
5. Mr. Cole incorporates the objections of all other creditors to the debtors Fourth Amended Plan of Adjustment as well as all objections that any creditor filed to any previous plan of adjustment filed by the debtor.

Respectfully submitted,

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Dated: May 19, 2014.

CERTIFICATE OF SERVICE

I hereby certify that on May 19, 2014, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which will send notification of such filing to all ECF participants. I hereby certify that I have mailed the foregoing document(s) by United States Postal Service to the following:

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